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December 21, 2015

VIA ECF AND VIA EMAIL(to NathanNYSDchambers@nysd.uscourts.gov)

Honorable Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2012
New York, NY 10007

Re: The parties' joint application to restore the action to the calendar.

Olga Arroyo v. JP Morgan Chase Bank, N.A. et al., Civil Action No. 1:15-cv-03524-AJN.

Dear Judge Nathan:

On November 20, 2015, the parties participated in a settlement conference with Magistrate Cott. The parties reached a settlement in principle, subject to further negotiation and reaching an agreement on written terms. On November 23, 2015, Your Honor issued an order [DE 35] discontinuing the action without prejudice to restoring the action to the Court's calendar if the application is made within 30 days. The parties have continued to attempt to consummate a settlement in a written agreement and to narrow the scope of the remaining issues, and have made progress along those lines.

The parties therefore respectfully request that the Court continue to retain jurisdiction of this matter for an additional 60 days to give the parties time to resolve their differences. If the parties are not able to resolve all of their differences, they intend to respectfully request further guidance by Magistrate Cott to help them do so. The length of time of the request is because given the holiday season, various of the parties' counsel will not be returning from vacation until early to mid-January 2016.

We thank the Court for its consideration.

Sincerely,

/s/

Ahmad Keshavarz

cc: opposing counsel (via ECF).